

## REMARKS

Applicants respectfully request reconsideration of the instant application in view of the foregoing amendments and the following remarks. Claims 13, 15-22, and 24-37 are pending in this application. Claims 1-12, 14 and 23 have been previously canceled without prejudice or disclaimer. Independent Claims 13, 22, and 24-31 have been amended to provide clarification. Applicants submit that support for these claims may be found throughout the originally filed specification, drawings and claims and that no new matter has been added by way of this Amendment/Response. Applicants further maintain that the claims in their original form are in condition for allowance and explicitly reserve the right to add/pursue the claims as originally filed at a later date and/or in one or more continuation applications.

### **Rejections Under 35 USC § 103**

Claims 13, 15-22 and 24-37 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Barros (U.S. Patent No. 6,307,573, hereinafter, "Barros") in view of Williams (U.S. Patent No. 6,735,593, hereafter "Williams"). Applicants respectfully traverse the Examiner's rejections and submit that the Examiner has not established a *prima facie* case of obviousness and that the pending claims are patentably distinct from the cited references, taken alone or in combination, for at least the following reasons.

MPEP § 706.02(j) prescribes that a rejection under 35 U.S.C. § 103 should set forth:

- (i) the relevant teachings of the prior art relied upon,
- (ii) the differences in the claim over the applied references,
- (iii) the proposed modification of the applied references to arrive at the claimed subject matter, and
- (iv) an explanation as to why the claimed invention would have been obvious to one of ordinary skill in the art at the time the invention was made.

Applicants submit that the rejections in the pending Office Action do not establish each of these requirements or a *prima facie* case of obviousness.

Regarding the Examiner's rejection of independent claim 13, Applicants submit that the cited references, taken alone or in combination, do not discuss or render obvious at least the claim elements recited in amended claim 13.

Amended independent claim 13 recites, *inter alia*:

Claim 13. A method comprising:

... wherein a first one of the plurality of corporate entities is at least a partial owner of a second one of the plurality of corporate entities and is graphically presented as being organizationally upstream from the second one of the plurality of corporate entities, wherein a third one of the plurality of corporate entities is at least partial owned by a fourth one of the plurality of entities and is graphically presented as being organizationally downstream from the fourth one of the plurality of entities ....

The pending rejection alleges that Barros teaches the claimed element:

...(col. 17, lines 1-8; wherein a hierarchical owned list such that illustrated in figure 6c and 7abc the node "World Maps" owns "N.America" and "N.America" owns "United States of America" and "United States of America" owns "Hawaii" which forms an owned parent to child relationship mapped (World Maps->N.America->United States of America->Hawaii). These four nodes are entities within the hierarchy list of entities illustrated and explained in figures 6c and 7abc.) (See Office action, pp. 3-4).

Applicants respectfully traverse this rejection and submit that the cited portion of Barros does not discuss or render obvious at least the alleged claim element. For example, the Examiner asserts the cited portions in Barros disclose "a hierarchical owned list" of geographical entities.

Applicants respectfully disagree and submit that the cited portion of Barros is nothing more than a world map with the Examiner's superimposed notation of various countries and states applied to the world map.

Applicants submit that in direct contrast to Examiner's characterization, Barros simply discusses a system for navigating through a series of maps in greater detail, wherein a user can also select a variety of item characteristics (e.g. weather conditions, travel deals etc.) for display. For example, Barros, Figures 6c-e illustrate a series of maps associated with Massachusetts in increasing detail. Barros Figure 6c, illustrates a view of a Massachusetts region. Barros Figure 6d and 6e present successive increasingly detailed views of a portions of the previous map. Barros' Figure 6d illustrates a map of Boston and Barros' Figure 6e illustrates a more detailed view of an neighborhood within Boston. In another example, Barros' Figure 7 involves a user selecting a more detailed successive display window, by selecting the desired greater detailed map from a listing (on the left side of Barros' Figure 7d). After selecting 'Hawaii' from the

listing, Barros' system populates a new screen with Figure 7de as a display screen with details related to Hawaii (such as weather and/or travel conditions). Regardless of whether the more next displayed detailed map is selected from a listing on the left side of a web page or selected by clicking on a portion of a less-detailed map, Barros simply facilitates navigation between successive displays of more granular map data.

Applicants respectfully submit that the Examiner has failed to establish that Barros map software discusses or renders obvious the claimed relationships between corporate entities. Specifically, Barros does not discuss or render obvious the claimed, "first one of the plurality of corporate entities is at least a partial owner of a second one of the plurality of corporate entities and is graphically presented as being organizationally upstream from the second one of the plurality of corporate entities, wherein a third one of the plurality of corporate entities is at least partial owned by a fourth one of the plurality of entities and is graphically presented as being organizationally downstream from the fourth one of the plurality of entities" as recited in Claim 13. Furthermore, Applicants submit that Williams' database architecture does not remedy the deficiencies of Barros with regard to independent Claim 13.

Applicants submit that independent claim 13 and its corresponding dependent claims 15-21 are therefore believed to be patently distinct from the cited prior art and in condition for allowance. Further, Applicants submit that amended independent claim 22 and its dependent claims 24-30, as well as amended independent claim 31 and its dependent claims 32-37, although different in scope, are patently distinct from the prior art for at least similar reasons to the deficiencies identified in Barros and Williams with regard to independent claim 13. Applicants submit therefore, that for at least the foregoing reasons, amended independent claims 22 and 31 and their respective dependent claims are also in condition for allowance.

In summary, Applicants submit that a *prima facie* showing of obviousness has not been made and respectfully request reconsideration and withdrawal of these bases of the Examiner's rejections. Should the Examiner maintain the rejection, Applicants request additional clarification as to how the Examiner believes the cited lines and Figures discuss the claimed, "a first one of the plurality of corporate entities is at least a partial owner of a second one of the plurality of corporate entities and is graphically presented as being organizationally upstream from the second one of the

plurality of corporate entities, wherein a third one of the plurality of corporate entities is at least partial owned by a fourth one of the plurality of entities and is graphically presented as being organizationally downstream from the fourth one of the plurality of entities" as recited in independent claim 13.

### CONCLUSION

In summary, Applicants submit that independent claims 13, 22 and 31 are patently distinct from the cited references for at least the reasons discussed above. Dependent claims 15-21, 24-30 and 32-37 are also patently distinct for the cited references for at least the reasons cited above. Thus, the Applicants respectfully submit that the supporting remarks and claimed inventions, 13, 15-22 and 24-37, all: overcome all rejections and/or objections as noted in the office action, are patentable over and discriminated from the cited reference(s), and are in a condition for allowance. Furthermore, Applicants believe that the above remarks, which distinguish the claims over the cited reference(s), pertained only to noted claim element portions. These remarks are believed to be sufficient to overcome the prior art. While many other claim elements and/or bases for rejection were not discussed as they have been rendered moot based on the above amendments and/or remarks, Applicants assert that all such remaining and/or not discussed claim elements, all, also are distinguished over the prior art and reserves the opportunity to more particularly remark and distinguish such remaining claim elements at a later time should it become necessary. Further, any remarks that were made in response to an Examiner objection and/or rejection as to any one claim element, and which may have been re-asserted as applying to another Examiner objection and/or rejection as to any other claim element(s), any such re-assertion of remarks is not meant to imply that there is commonality about the structure, functionality, means, operation, and/or scope of any of the claim elements, and no such commonality is admitted as a consequence of any such re-assertion of remarks. As such, Applicants do not concede that any claim elements have been anticipated and/or rendered obvious by any of the cited reference(s). Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection(s) and/or objection(s) and allowance of all claims.

If a telephone conference would facilitate prosecution of this application in any way, the Examiner is invited to contact the undersigned at the number provided.

**AUTHORIZATION**

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 03-1240 Order No. 17209-324.

In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 03-1240, Order No. 17209-324.

Respectfully submitted,  
CHADBOURNE & PARKE, L.L.P.

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